

DAAS Administrative Letter No. 06-14

To: Area Agencies on Aging
County Departments of Social Services

Subject: Certification Procedures for In-Home Aide Home Management
Only Levels of Service

Date: October 2, 2006

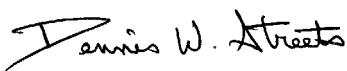
I am pleased to be sending you a new document that describes the process of certifying In-Home Aide Home Management only programs supported with HCCBG, SSBG, or other DAAS or DSS funding. The procedures for certification had not been incorporated into one single document until the present document was created. The intent is to help all who have a role in operating or certifying home management only programs to have a common understanding of what is involved in carrying out the process more uniformly than in past years.

I would call to your attention some clarifications that are being made regarding previous certification activities. The attempt is to standardize the procedures for certification. The following procedures are those necessitated by varying degrees of interpretation since the mid 1990's.

- Start up programs must be in operation for at least six weeks but no longer than three months before the program is formally reviewed for compliance with standards for the purpose of determining certification.
- Providers who have operated a program for at least six weeks but no more than three months and are found to have non-compliance issues with standards will be given a period not to exceed three months to correct the issues for the purpose of determining certification.
- Current providers who are being reviewed for recertification and are found to have compliance issues must correct these problems no later than three months following the end of the current certification period.

The document is the result of input from all levels of staff related to the certification process both within DAAS and by several AAA directors. We hope it will be useful to everyone who has a vested interest in the certification process for all levels of In-Home Aide Home Management only services supported with funds available through DAAS and DSS in North Carolina.

Sincerely,



Dennis W. Streets, Director
NC Division of Aging and Adult Services

Division of Aging and Adult Services

CERTIFICATION OF IN-HOME AIDE PROGRAMS PROVIDING HOME MANAGEMENT ONLY SERVICES

Effective 10/01/06

Certification of In-Home Aide Programs Providing Home Management Only Services

A. What is Certification?

Certification is the formal designation of Quality Assurance given to a program of In-Home Aide Home Management Only determined to be in compliance with basic minimal standards for this level of service. It is determined through an on-sight review of program operations in relation to the state standards set forth for the program, client records, personnel and administrative files related to the service maintained by the agency seeking certification, and interviews with service recipients.

In 1991 the NC General Assembly passed the Home Care Licensure law requiring all organizations engaged in providing personal care to individuals in their home settings to be licensed and required to follow rules, regulations, and standards relative to the provision of such care. The law was effective July 1, 1992. The Division of Facility Services (DFS) was the state agency designated to develop the licensure program and to be responsible for technical assistance to community entities as they developed home care programs. DFS licenses agencies and provides on-going oversight to assure that licensed entities continue to operate according to the rules and regulations and standards of care for home care, which includes but is not limited to those personal care services provided by in-home aides. Protection of the public and assurance of quality care continue to be the purpose and driving force behind Home Care Licensure.

Because people may need many personal care services related to activities of daily living as well as incidental services such as cooking, cleaning, laundry assistance, shopping and other necessary non-personal care services, the North Carolina Department of Health and Human Services (DHHS) in December 1991 implemented uniform standards for the provision of all levels of In-Home Aide services. Assurance of quality care to the public had been one of the factors that resulted in passage of the Home Care Licensure law; however, those services that were home management in nature did not have a similar means of assuring quality to the public. When the uniform standards for in-home aide programs were implemented, they included the requirement that programs not subject to licensure regulations must seek accreditation for their home management service programs from outside accrediting organizations. This requirement entailed paying a fee for achieving accreditation status. By 1995 fees for accreditation had risen to the point that agencies had become burdened by the financial investment. DHHS, building upon the monitoring of in-home aide programs supported by funds from the Division of Aging (DOA) or the Division of Social Services (DSS) responded by creating a Certification process for agencies

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utilizing DOA or DSS funding for in-home aide programs providing only home management services. Certification is intended to give assurance to the general public and to individuals needing only home management services that the programs are well administered and the services are provided according to defined standards for home management levels of service. It is a local agency decision whether to seek Accreditation or to choose the state's Certification option; however, one or the other must be achieved if programs are supported with Home and Community Block Grant (HCCBG) or Social Services Block Grant (SSBG) or other funding available to DAAS/DSS from the state. The certification process is managed by the DAAS.

Any program of In-Home Aide Home Management only service utilizing DAAS or DSS funding may choose to seek accreditation rather than certification. There are several nationally recognized accrediting bodies, among which are the Accreditation Commission for Home Care, JCAHO, and CHAPS. Addresses for these organizations are found in **Appendix A**.

In all cases, and without exception, a local aging program or a county DSS must be either certified or accredited if HCCBG, SSBG, or other DAAS/DSS funding is used to support an In-Home Aide Home Management Only program.

Program standards for In-Home Aide Home Management only services are found in two documents currently utilized by the Division of Aging and Adult Services to initially set up and provide on-going monitoring of programs based in local aging agencies funded with HCCBG dollars or those based in local Departments of Social funded with SSBG or other DSS funds specific for the service. These documents were developed in the early 1990's and are the In-Home Aide Services – Policies and Procedures of the North Carolina Division of Aging and the Family Services Manual, Volume VII, of the North Carolina Division of Social Services. The future plan is for these two documents to be combined into one under the auspice of the Division of Aging and Adult Services.

Program reviews for the purpose of certifying an In-Home Aide Home Management only service is an initial and ongoing process that occurs at least every three (3) years. It is a process that determines whether or not an organization provides a quality program of In-Home Aide Home Management only services. The reviewer would notify an agency that is already certified no less than three months prior to the end of the three-year cycle that the recertification process will be initiated. The notification period should allow time for any problems to be corrected so as to prevent a program losing certification status.

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The review of programs of In-Home Aide Home Management Only that are operated by departments of social service, for the purpose of recertification, is carried out by a Program Compliance Representative (PCR) of the Adult Services Section of DAAS. Should a DSS decide to initiate an In-Home Aide Home Management Only program, the Adult Program Representative (APR) working with the local DSS would provide technical assistance to set up the program; however, the review for purposes of determining the initial certification of a DSS program would then be conducted by the PCR assigned to work with that county DSS. Designated staff of Area Agencies on Aging (AAAs) provide technical assistance to set up new programs and do the review for certification of all In-Home Aide Home Management only services operated by other community agencies that utilize HCCBG funding. The notable exception to the review of DSS or other community agencies would be the Commission of Indian Affairs, a state agency whose Home Management program is supported through a grant of SSBG funds, a program whose review is conducted by designated staff of DAAS.

An agency that has not provided any level of In-Home Aide Home Management Only service but wants to do so because DAAS or DSS related funding has become available will be given technical assistance to set up the program by the appropriate AAA staff, or APR, or another staff member of DAAS. The person who will provide the technical assistance and review is determined on the basis of the agency (aging entity, or DSS) seeking certification. The new provider should operate the program for at least six weeks but no longer than three months, before the program is formally reviewed for compliance with standards. If the program is found to be in compliance with standards, a Certificate will be issued by DAAS. An extension period of up to three months may be granted if there are compliance issues that can be resolved with technical assistance.

An organization licensed or accredited for Home Care that has not provided any level of In-Home Aide Home Management Only but wants to do so may initiate a program without having to seek certification of the programs should funds from DAAS or DSS become available to them.

IMPORTANT: *Certification applies to organizations utilizing DAAS or DSS funding for Home Management only programs that are neither licensed nor accredited.*

B. What is Reviewed in the Certification Process for In-Home Aide Home Management Only Services Provided by an Agency?

The tools used by reviewers to help them determine that an organization is in compliance with standards for In-Home Aide Home Management only services are the same tools used for program monitoring of IHA services. When an

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agency is initially reviewed for certification and found to have compliance issues, it will be given an additional period of time to make the necessary corrections, changes, or additions before certification can be granted. ***This period is not to exceed three months.*** In addition, an agency being reviewed for recertification and not able to correct compliance issues before the end of the current certification period must do so no later than three months following the date that recertification should have occurred. If compliance issues are not resolved during the extension period, certification will not be granted. Should an agency lose or never achieve certification for its Home Management Only program, the agency will not be able to expend any DAAS or DSS dollars available to it for a program of In-Home Aide Home Management Only services unless it does so through a contractual arrangement with another entity. That entity must be licensed, accredited, or already certified.

The Chief of Service Operations in DAAS should be notified whenever an agency is being granted an extension period of up to three months for resolving problems that could not be corrected before the end of the current three year certification period, or in the case of a start up program, during the initial start up period. Should problems not be resolved during the three-month extension period, certification or recertification will not be granted. Problems occurring at any point during the three-year period of certification that are brought to the attention of the agency by DAAS or AAA staff or some other entity and cannot be resolved, even with the provision of technical assistance, will result in loss of certification, with the document being recalled by DAAS. An agency is not allowed to continue to operate a program of In-Home Aide Home Management Only with DAAS or DSS funds if compliance issues are not resolved.

The areas covered by the monitoring tools used for certification determination are as follows:

- Program Administration
- Levels of service
 - Supervisory contact
 - Competency requirements
 - Training/testing
 - Subcontracts
 - In-Home Aide policies for managing and administering the program
- Client records reviewed
 - Assessment/ reassessment
 - Program eligibility
 - Service provision
 - Reporting of service provision
 - Competency requirements
 - Other documentation
 - Termination of Service (when applicable)

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- Service Unit Verification
- Consumer Contributions
- Client/Family Satisfaction Interviews conducted in the home

C. Description of the Process of Certification

The In-Home Aide Services Consultant of DAAS maintains the master schedule for certification of all Home Management only programs supported with HCCCBG, SSBG, or other funds for home care available to DAAS or DSS. The schedule is the result of the history of monitoring in files maintained on each certified program as well as input from AAA's and the Adult Services Program Manager of DAAS. Prior to the beginning of a new fiscal year, the Master Schedule would be completed and made available to AAA's and PCR's.

The following describes the basic tasks that must be done both to carry out the process of program review for the purpose of initial program certification or recertification by either a AAA staff person or a PCR:

Initial Certification Procedures:

- AAA staff or an APR, as appropriate, would provide technical assistance to enable a new provider with access to DAAS or DSS funds for In-Home Aide Home Management Only services to set up the program.
- A program should be reviewed before the end of the start up period agreed upon with the agency, a period that could be as short as six weeks or as long as three months.
- AAA staff or a PCR would obtain client lists and units of service provided during the initial start up period from either the Aging Resources Management System (ARMS) of DAAS or from the Service Information System (SIS) of DSS, as appropriate, based upon the funding that provided the service.
- AAA staff or a PCR would schedule the review of the program for the purpose of initial certification prior to the end of the agreed upon initial start up period.
- A program may have up to three additional months to correct any compliance issues that may be identified during the review.
- ***Following the identification of clients and units of service and the scheduling of the review, the procedures for the initial review are the same as those for the recertification of on-going programs.***

Recertification Procedures:

- AAA staff or a PCR would contact the agency due for certification no later than three months prior to the expiration of the current certification period to schedule the on-site review (the length of the review would depend upon the size of the caseload and the sample selected).
- PCR staff would obtain from the ARMS staff of DAAS a client list and units of service provided during the three-month period preceding the on-site visit if the program uses HCCBG funds.
- PCR staff would also request a client list and units of service from SIS for IHA Home Management Only service supported with DSS funds during the three-month period preceding the on-site visit.
- AAA staff would pull a similar client list and units from the three-month period preceding the review date from ARMS for currently certified programs supported with HCCBG funds.
- From the list of clients served during the three-month period prior to the on-site visit for recertifications by AAA staff or a PCR, the client sample is selected.
- Prior to the scheduled on-site review, the client sample list and copies of the review tools are sent to the DSS or aging organization to be reviewed.
- The agency would be requested to have the client records, other related files, and the day /time sheets of the staff responsible for direct service provision available for review during the on site visit.
- Upon arrival at the agency, an entrance conference would be held with the agency director or designated staff to complete the In-Home Aide Monitoring Tool.
- The sample records of selected clients would be reviewed for adherence to standards in service provision.
- Aide time sheets would be reviewed in relationship to the services provided according to the aide plan of care.
- Units both billed and paid for would be verified
- Consumer contributions would be reviewed.
- Two client satisfaction reviews would be held in the homes of randomly selected clients who will agree to be interviewed.
- An exit conference would be held with the staff that participated in the entrance conference and any others that the agency would request to participate to discuss the findings of the review.
- If there are compliance issues that need to be resolved before continuing recertification is recommended, the agency can be given up to three months to make needed corrections.
- The AAA staff or PCR will request a corrective action plan from those agencies that are given extension periods of up to three months:

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- 1) Notification, outlining the nature of the compliance issue that necessitates an extension period, will be sent to the Chief of Service Operations in DAAS
- 2) AAA staff or the PCR will follow up with the agency within the three-month extension to monitor how the corrective action plan is being implemented
- 3) Should an agency be unable to make needed corrections to bring the program into compliance with all standards during the extension period, continuing certification will not be granted.

Achievement of Certification

- If there are no compliance problems or issues that do not impact the quality of the services delivered to clients, the staff performing the review should maintain the monitoring tools used and a copy of the certification report sent to DAAS recommending certification for a period of three years.
 - 1) A copy of the report should be sent to the DSS that was reviewed, the AAA director with jurisdiction over the county where the DSS is located if HCCBG funds are involved, the Adult Program Representative (APR) assigned to the DSS, and the Section Chief of Service Operations in DAAS
 - 2) A copy of the report letter should be sent to the aging agency using HCCBG funds that was reviewed by the AAA and to the Section Chief of Service Operations in DAAS
 - 3) A copy of the report should be sent to the DSS or other agency utilizing SSBG or other DSS funds that was reviewed by a PCR, with copies to the appropriate APR and the Section Chief of Service Operations in DAAS
 - 4) A memorandum recommending (**Appendix B suggests a recommended format**) certification must be sent to the Chief of Service Operations in DAAS by the AAA or PCR and should include the following:
 - The name of the agency being recommended for certification
 - The name, title, and address of the person to whom the certification should be mailed
 - The levels of Home Management provided by the agency
 - The dates “from and to” that cover the certification period
 - If corrective action was needed, briefly state the compliance concern and the corrective action that was taken to assure compliance to a standard or standards
 - A copy of the recommendation memorandum should go to the agency being recommended for certification
- The Chief of Service Operations will delegate to the In-Home Aide Services Consultant the responsibility for the preparation of the transmittal/congratulatory letter and the Certificate.

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- 1) The Director of DAAS signs the Certificate.
- 2) The administrator of the agency is sent the letter of congratulations from the Chief of Service Operations along with the signed Certificate
- 3) Copies of the letter and Certificate should be provided to the following:
 - The AAA receives a copy of the letter and Certificate when the review was completed by AAA staff.
 - The PCR, the APR for the county DSS, and the applicable AAA (when HCCBG funds have been used to provide the service for the DSS program reviewed) receive a copy of the letter and Certificate when the review was completed by the PCR.
 - The PCR and the APR receive a copy of the letter and Certificate when the service was provided with DSS funds and reviewed by a PCR.
- The In Home Aide Services Consultant in DAAS will maintain files, including letters and a copy of the Certificate for each organization certified, as well as files for all organizations that do not become initially certified or recertified.

D. Contractual Arrangements for Provision of Home Management Only Programs

Any organization receiving DAAS or DSS funding that chooses to contract for Home Management Only services through another organization can do so only under the following conditions: subcontract with an organization that 1) is licensed for home care and will agree to provide Home Management services as well or 2) is an accredited home care agency or 3) is already certified by DAAS to provide Home Management only. The contract would specify the responsibilities of both organizations in carrying out the service. The established state procedures for monitoring In-Home Aide Home Management only programs that are subcontracted to another entity by a local aging program or a county department of social services would be followed to assure that the service is provided in accordance with standards.

The Commission of Indian Affairs (CIA) receives SSBG funds through a DAAS contract to provide Level I Home Management only service through tribal organizations in those counties designated in the annually renewed contract. The process of carrying out the delivery of service to eligible clients is a joint endeavor of the CIA and the county department of social services named in the annual contract with DAAS. The basic procedures for certification as outlined in the section of this document titled “**Description of the Process of Certification**” are to be followed. This includes notification to the CIA by the

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DAAS that recertification is due, choosing client records to review, reviewing units of service and billing records, conducting entrance and exit conferences with staff, reviewing client and administrative records for compliance with standards for the service, interviewing two clients of the service, preparing reports on the certification process, providing technical assistance if needed, and doing those tasks that lead to the issuance of the Certificate. Designated staff in the DAAS conduct the certification reviews of the CIA In-Home Aide Level I Home Management Only program.

ACCREDITING ORGANIZATIONS FOR HOME/HEALTH CARE

Accreditation Commission for Health Care, Inc. (ACHC)

Tom Cesar, President

4700 Falls of Neuse Road, Suite 280

Raleigh, NC 27609

(919) 785-1214

(919) 785-3011 (fax)

(734) 939-6272 (e-fax)

E-Mail: customerservice@achc.org

Community Health Accreditation Program (CHAP)

Terry A. Duncombe, RN, President/CEO

1300 19th St., NW, Suite 150

Washington, DC 20036

1-800-656-9656

(202) 862-3413

(202) 862-3419 (fax)

E-Mail: info@chapinc.org

Joint Commission on Accreditation of Healthcare Organizations (JCAHO)

One Renaissance Boulevard

Oakbrook Terrace, IL 60181

Main: (630) 792-5000 or Customer Service: (630) 792-5800

E-Mail: info@jcrinc.org

HOME MANAGEMENT ONLY CERTIFICATION MEMORANDUM

To: Steve Freedman
Chief, Service Operations

Fm:

Date:

Re: In-Home Aide Home Management Only Certification Recommendation

The following organization has met the standards for certification of its Home Management Only IHA program and should be certified for a period of three years:

Name of Organization:

Name of Director:

Mailing Address:

Home Management Only Levels provided by organization:

Effective Period for Certification (From and To dates):

Indicate person(s) as appropriate to be cc'd: when Certificate and transmittal letter are sent from DAAS :

- ☐ AAA Director
- ☐ Adult Services Program Administrator
- ☐ AAA Staff Person who conducted review
- ☐ PCR, who conducted review
- ☐ APR
- ☐ Other (identify)

If compliance issues were found and corrected, please note briefly the issue(s) and what corrective action was taken: